

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE SUBPOENAS SERVED ON JSC STATE EXPORT-IMPORT BANK OF UKRAINE; BANK POLSKA KASA OPIEKI SA; DEUTSCHE BUNDESBANK; RESERVE BANK OF AUSTRALIA; AB SEB BANKAS; SEB SECURITIES, INC.; BANK OF MONTREAL; BMO FINANCIAL CORP.; BMO CAPITAL MARKETS CORP.; THE BANK OF NEW YORK MELLON CORPORATION; BARCLAYS BANK PLC; BARCLAYS CAPITAL INC.; BNP PARIBAS FORTIS SA/NV; BNP PARIBAS USA, INC.; BNP PARIBAS; CITIBANK N.A.; CITIGROUP INC.; CITIGROUP GLOBAL MARKETS LTD.; COMMERZBANK AG; COMMERZ MARKETS LLC; CREDIT SUISSE (SWITZERLAND) LTD.; CREDIT SUISSE AG; CREDIT SUISSE (USA), INC.; DANSKE BANK A/S; DANSKE MARKETS INC.; DEUTSCHE BANK TRUST COMPANY AMERICAS; DEUTSCHE BANK TRUST CORPORATION; DEUTSCHE BANK AG; DNB BANK ASA; DNB CAPITAL LLC; DNB MARKETS, INC.; HSBC BANK PLC; HSBC NORTH AMERICA HOLDINGS INC.; JPMORGAN CHASE BANK N.A.; JPMORGAN CHASE & CO.; J.P. MORGAN SECURITIES PLC; J.P. MORGAN SECURITIES LLC; MUFG BANK, LTD.; MUFG AMERICAS HOLDING CORPORATION; MUFG SECURITIES AMERICAS INC.; RAIFFEISEN BANK INTERNATIONAL, AG; RB INTERNATIONAL MARKETS (USA) LLC; SANTANDER BANK POLSKA S.A.; STANDARD CHARTERED BANK PLC; STANDARD CHARTERED BANK (HONG KONG) LTD.; STANDARD CHARTERED SECURITIES (NORTH AMERICA) LLC; UBS SWITZERLAND AG; UBS AMERICAS INC.; UBS AG; UBS AMERICAS HOLDINGS LLC; UNICREDIT BANK AG; AND UNICREDIT CAPITAL MARKETS LLC:

UKRAINE,

Petitioner,

-against-

PAO TATNEFT,

Respondent.

Misc. Case No. 1:22-mc-00036

(Arising from Case No. 1:17-cv-00582-CKK in the United States District Court for the District of Columbia)

**NOTICE OF UKRAINE'S  
MOTION TO QUASH OR  
MODIFY THIRD-PARTY  
SUBPOENAS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Ukraine's Motion to Quash or Modify Third-Party Subpoenas, and Declarations of Oksana Markarova, Oleksii Reznikov, Irina Mudra, and Kyrylo Shevchenko in support, Petitioner Ukraine, by its attorneys, will move this Court before the Honorable \_\_\_\_\_, United States District Court Judge for the Southern District of New York, at a date and time to be determined by the Court, in Courtroom \_\_\_\_\_, United States Courthouse, 500 Pearl Street, New York, New York 10007, pursuant to Federal Rules of Civil Procedure 45(d) and (g) for an order quashing or modifying subpoenas served on fifty-two third parties in connection with *Pao Tatneft v. Ukraine*, No. 1:17-cv-00582-CKK, a closed case in the United States District Court for the District of Columbia.<sup>1</sup>

PLEASE TAKE FURTHER NOTICE that pursuant to Local Rule 6.1(a) of the Local Rules for the Southern and Eastern Districts of New York, any opposing affidavits and answering memoranda of law shall be served within seven days after service of the moving papers.

Dated: February 8, 2022

Respectfully submitted,

s/ Maria Kostytska  
Maria Kostytska (New York Bar # 4380101)  
Winston & Strawn LLP  
68 rue du Faubourg Saint Honoré  
Paris 75008, France

---

<sup>1</sup> The fifty-two third-party subpoena recipients are AB SEB bankas, Bank of Montreal, Bank Polska Kasa Opieki SA, Barclays Bank plc, Barclays Capital Inc., BMO Capital Markets Corp., BMO Financial Corp., BNP Paribas, BNP Paribas Fortis SA/NV, BNP Paribas USA, Inc., Citibank N.A., Citigroup Global Markets Ltd., Citigroup Inc., Commerz Markets LLC, Commerzbank AG, Credit Suisse (Switzerland) Ltd., Credit Suisse (USA), Inc., Credit Suisse AG, Danske Bank A/S, Danske Markets Inc., Deutsche Bank AG, Deutsche Bank Trust Company Americas, Deutsche Bank Trust Corporation, Deutsche Bundesbank, DNB Bank ASA, DNB Capital LLC, DNB Markets, Inc., HSBC Bank plc, HSBC North America Holdings Inc., J.P. Morgan Securities LLC, J.P. Morgan Securities plc, JPMorgan Chase & Co., JPMorgan Chase Bank N.A., JSC State Export-Import Bank of Ukraine, MUFG Americas Holding Corporation, MUFG Bank, Ltd., MUFG Securities Americas Inc., Raiffeisen Bank International, AG, RB International Markets (USA) LLC, Reserve Bank of Australia, Santander Bank Polska S.A., SEB Securities, Inc., Standard Chartered Bank (Hong Kong) Ltd., Standard Chartered Bank plc, Standard Chartered Securities (North America) LLC, The Bank of New York Mellon Corporation, UBS AG, UBS Americas Holdings LLC, UBS Americas Inc., UBS Switzerland AG, UniCredit Bank AG, and UniCredit Capital Markets LLC.

(331) 53648282  
(331) 53648220 (fax)  
MKostystka@winston.com

Kelly A. Librera  
Winston & Strawn LLP  
200 Park Avenue  
New York, NY 10166-4193  
(212) 294-4622  
(212) 294-4700 (fax)  
KLibrera@winston.com

*Counsel for Ukraine*